

60,469-220  
PA-000.05079-USREMARKS

Applicant thanks the Examiner for the remarks and analysis contained in the Office Action. Clerical corrections are made to claims 21 and 22. New claims 23-25 are presented. Applicant respectfully requests reconsideration of this application.

Applicant respectfully traverses the rejection under 35 U.S.C. §102 of claims 1-4, 6, 8-11, 13-16, 18, 19, 21 and 22 based upon the *Boltrek* reference. Applicant respectfully submits that the Examiner is not correctly interpreting the *Boltrek* reference. The Examiner appears to contend that the teeth 13+ of the step chain links 13 in the *Boltrek* reference include compressible projections. The teeth 13+ of the step chain links 13 of the *Boltrek* reference are made of metal and, therefore, do not include compressible projections. As can be appreciated from the cross sectional illustration of Figure 2, the cross hatching in the drawing shows that the laminated plates of the step chain links 13 are metal. Additionally, conventional step chain links especially at the time of the *Boltrek* reference were most typically made of metal and there is no reason to interpret the reference differently.

Additionally, even if the teeth 13+ of the step chain links 13 could somehow be construed as having a compressible projection, it is not possible for the teeth of the step chain links 13 to engage the step chain links 13. That would require the teeth 13+ engaging themselves, which is not possible. In other words, the Examiner is interpreting the step chain of *Boltrek* as the drive belt of Applicant's claims. That is not a reasonable interpretation because the claimed teeth on Applicant's drive belt are adapted to engage a step chain, which means the claimed teeth are not on the step chain.

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Another reason why Applicant disagrees with the Examiner's interpretation of the *Boltrek* reference is that it is not possible for the teeth 13+ of the step chain links 13 to be on an outer side of the step chain. As is clearly appreciated from Figure 2, for example, the teeth 13+ face inward for engagement with the modular drive unit 23. Therefore, the teeth 13+ cannot reasonably be interpreted as being on an outer side adapted to engage a corresponding portion of a step chain as suggested by the Examiner.

If the Examiner is interpreting the steps 11 as a "step chain" the *Boltrek* reference still cannot be applied as suggested by the Examiner. If the steps 11 were considered a "step chain," the teeth 13+ on the step chain links 13 do not in any way engage the steps 11 so that the teeth 13+ do not engage a "step chain" of any sort within the *Boltrek* reference. Again, the step chain links 13 are the step chain and the teeth 13+ cannot engage themselves.

For any one of the above reasons, the *Boltrek* reference cannot be interpreted in a manner to be consistent with Applicant's claims. Therefore, there is no *prima facie* case of anticipation.

Applicant respectfully traverses the rejection of claims 5, 7, 12, 17 and 20 under 35 U.S.C. §103 based upon the *Boltrek* reference. There is no *prima facie* case of obviousness because the *Boltrek* reference does not teach what the Examiner states in the Office Action as explained above. Therefore, the Examiner's proposed modification to the *Boltrek* reference does not establish a *prima facie* case of obviousness because even if that modification could be made to the *Boltrek* reference, the result is not what the Examiner contends. None of Applicant's claims can be considered obvious.

Applicant believes that this case is in condition for allowance. If the Examiner believes that a telephone conference would facilitate moving this case forward to being issued, Applicant's representative will be happy to discuss any issues regarding this application and can